

Firm No. 37409

12612.A2C4

SRM/NL/mrs

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CHRIS MUCZYNSKI.

Plaintiff,

V

JACK LIEBLICK, PATRICK MASUDA,
DETECTIVE WRONKOWSKI, JEFFREY
LOQUERCIO CITY OF CHICAGO, and
SERGEANT GRECO, DARRELL
FARMER, CITY OF MELROSE PARK
and MIKE FARMER.

Defendants.

No. 10 cv 0081

Honorable John W. Darrah

Magistrate Geraldine Soat Brown

RULE 11 MOTION FOR SANCTIONS

Defendants, SERGEANT GRECO (hereafter “Greco”), DARRELL FARMER (hereafter “D. Farmer”) and CITY OF MELROSE PARK (hereafter “Melrose Park”), by and through their attorneys, Stephen R. Miller and Nikoleta Lamprinakos, moves this court, pursuant to Rule 11, to enter sanctions against Plaintiff’s counsel and the Plaintiff, jointly, for naming Officer Darrell Farmer as a defendant in this case. In support thereof, Defendants state as follows:

1. Officer Darrell Farmer had nothing to do with this incident.
2. Officer Darrell Farmer had no contact with the City of Chicago officers as alleged in the complaint.
3. Officer Darrell Farmer was not a co-worker with the Plaintiff or with any other officer involved in this occurrence.

4. Officer Darrell Farmer has no idea why he has been named in this case.

5. Plaintiff has not pleaded any specific actions by Officer Darrell Farmer that caused or contributed to the alleged damages sustained by the Plaintiff because there are none.

6. Counsel for the Defendant notified counsel for the Plaintiff in writing inviting him to comply with the safe harbor provisions of Rule 11 by dismissing Officer Farmer, with no response.

6. The defense also requests reasonable expenses including attorneys' fees incurred, both in filing this motion and defending Officer Darrell Farmer in this matter.

WHEREFORE, Defendants, SERGEANT GRECO, DARRELL FARMER and CITY OF MELROSE PARK request that Rule 11 Sanctions be entered in this matter and for costs, including attorneys' fees, as appropriate, or for other relief.

Respectfully submitted,

MYERS & MILLER LLC

By: s/Stephen R. Miller
Stephen R. Miller

Stephen R. Miller (6182908)
Nikoleta Lamprinakos (6274018)
Johanna L. Tracy (6278612)
MYERS & MILLER LLC
Thirty North LaSalle Street
Suite 2200
Chicago, Illinois 60602
Ph: 312/345-7250
Fx: 312/345-7251